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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ROWLAND MARCUS ANDRADE,

Defendants.

CASE NO.: 20-cr-00249-RS

**NOTICE OF MOTION AND MOTION TO
WITHDRAW AS COUNSEL FOR
DEFENDANT ROWLAND MARCUS
ANDRADE; [PROPOSED] ORDER
GRANTING MOTION TO WITHDRAW**

Date: July 20, 2021
Time: 2:30 p.m. PDT
Judge: The Hon. Richard Seeborg

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Attorneys for Defendant Rowland Marcus Andrade

1 **PLEASE TAKE NOTICE THAT** at 2:30 p.m. PDT on Tuesday, July 20, 2021, or as
 2 soon thereafter as counsel may be heard before the Honorable Richard Seeborg, United States
 3 District Judge of the United States District Court for the Northern District of California, San
 4 Francisco Division, 450 Golden Gate Avenue, San Francisco, Katherine D. Cooper, Lionel
 5 André of Murphy & McGonigle, PC, and Mauricio S. Beugelmans of Murphy & McGonigle,
 6 RLLP, shall and hereby do respectfully seek leave of this Court, pursuant to Local R. 11-5(a),
 7 Crim. Local R. 44-2(b), and in compliance with Cal. R. Prof. Conduct Rule 1.16(b), to withdraw
 8 as counsel for Defendant Rowland Marcus Andrade.

9
 10 **MOTION TO WITHDRAW AS COUNSEL FOR DEFENDANT ANDRADE**

11 Pursuant to the Northern District of California's Criminal Local Rule 44-2(b), Katherine
 12 D. Cooper and Lionel André of Murphy & McGonigle, PC, and Mauricio S. Beugelmans of
 13 Murphy & McGonigle, RLLP ("Movants") hereby notify the Government and the Court of their
 14 intent to withdraw as counsel for defendant Rowland Marcus Andrade.

15 Movants state the following grounds for this notice and motion:

16 1. Movant Mauricio S. Beugelmans of Murphy & McGonigle, RLLP, filed his notice of
 17 appearance in the instant matter on December 22, 2020.

18 2. This Court granted Movants Cooper and André leave to appear *pro hac vice* in this
 19 action pursuant to its December 22, 2020, Order.

20 3. Movants have represented DEFENDANT Andrade since November 2020, in
 21 connection with the instant criminal matter by joining his criminal defense team, headed by
 22 Manny Medrano.

23 4. Movants seek leave to withdraw their representation of Defendant Andrade for
 24 professional considerations under Cal. R. Prof. Conduct Rule 1.16(b). In light of their duty of
 25 confidentiality under Cal. R. Prof. Conduct Rule 1.6, Movants decline to provide additional
 26 details regarding their basis for withdrawing pursuant to Cal. R. Prof. Conduct Rule 1.16(b).
 27 Given Rule 1.6, any further detail should only be shared with the Court *in camera*.
 28

5. Movants' withdrawal will not cause any prejudice to Defendant Andrade or delay in this matter because Defendant Andrade's original defense attorneys, Manny Medrano and Brian Beck, will remain attorneys of record for Defendant Andrade. In addition, because Defendant Andrade is not currently detained upon information and belief, it is unlikely that a trial date in this matter will be set to commence before 2022.

6. Given the insubstantial nature of this Motion, as well as the substantial burden to all parties in travelling and attending a hearing on this Motion, Movants respectfully request that the Court waive oral argument.

CONCLUSION

For the foregoing reasons, Movants respectfully request that this Court waive oral argument on this Motion, grant them leave to withdraw as counsels in the above-captioned matter, and enter an order stating that Movants have so withdrawn.

Date: July 15, 2021

Respectfully submitted,

/s/ Katherine D. Cooper

KATHERINE D. COOPER

LIONEL ANDRÉ

Murphy & McGonigle, P.C.

MAURICIO S. BEUGELMANS

Murphy & McGonigle, RLLP

Attorneys for Defendant Rowland Marcus
Andrade

PROOF OF SERVICE

The undersigned certifies that, on July 15, 2021, she caused this document to be electronically filed with the Clerk of Court using the CM/ECF system, which will send notification of filing to counsel of record for each party. In addition, she emailed a copy of this document to be emailed to Defendant, Rowland Marcus Andrade, at his last known email address.

/s/ Katherine D. Cooper
Katherine D. Cooper

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,
16
17 Plaintiff,
18
19 vs.
20 ROWLAND MARCUS ANDRADE,
21
22 Defendants.

CASE NO.: 20-cr-0249-RS

**[PROPOSED] ORDER GRANTING
MOTION TO WITHDRAW AS
COUNSEL FOR DEFENDANT
ROWLAND MARCUS ANDRADE**

Date: July 20, 2021
Time: 2:30 p.m. PDT
Judge: The Hon. Richard Seeborg

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Attorneys for Defendant Rowland Marcus Andrade Katherine D. Cooper, Lionel André, and Mauricio S. Beugelmans (“Movants”) seek to withdraw as counsel for defendant Rowland Marcus Andrade in the above-captioned matter pursuant to Northern District of California’s Criminal Local Rule 44-2(b). As this Court finds that Katherine D. Cooper, Lionel André and Mauricio S. Beugelmans have submitted sufficient grounds for withdrawal, and that the granting of their Motion will not cause substantial prejudice or delay to Rowland Marcus Andrade, IT IS HEREBY ORDERED that the Motion filed by Movants Katherine D. Cooper, Lionel André and Mauricio S. Beugelmans to withdraw as counsel for defendant Rowland Marcus Andrade is GRANTED, and Katherine D. Cooper, Lionel André, and Mauricio S. Beugelmans are hereby terminated as counsel in this proceeding.

DATED: _____ By: _____
Hon. Richard Seeborg